



MONTGOMERY McCRACKEN

ATTORNEYS AT LAW

Timothy Semenoro

Admitted in New York, New Jersey

437 Madison Avenue

New York, NY 10022

Tel: 212-867-9500

Direct Dial:

212-551-7793

Fax:

212-599-1759

Email:

tsemenoro@mmwr.com

September 30, 2024

By ECF

Honorable Alvin K. Hellerstein
United States District Judge
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *In re MAERSK EINDHOVEN Voyage 103N Shipper Cases*
Case No. 21 Civ. 8048 (AKH) (lead case)

Dear Judge Hellerstein,

We represent defendant Maersk A/S in the above-captioned consolidated cases. On behalf of all the parties, we write to report on our efforts.

The parties continue to work cooperatively on resolving the claims, and there are no open issues to be resolved by the Court at this time.

Since our last update, we have made additional progress. For 22cv1368, the settlement agreement for the last schedule of claims was recently fully executed and is being held in escrow. We are just waiting on the transfer of settlement funds before the entire action can be voluntarily dismissed. For 23cv2168 (which was transferred from Judge Carter), documents were exchanged, questions were answered, and the parties continue to discuss the underlying claim. For 23cv9177, the parties have reached a settlement and executed the settlement agreement, which is being held in escrow. As soon as the respective settlement funds are transferred, we can dismiss the action.

In short, we remain close to resolving the last of these actions, but more time is needed. If Your Honor is agreeable, we respectfully propose reporting on the status of the remaining actions on or before November 29, 2024.

*So ordered
10-1-24
Alvin K. Hellerstein*

MONTGOMERY McCRACKEN WALKER & RHOADS LLP

PENNSYLVANIA • NEW YORK • NEW JERSEY • DELAWARE

A PENNSYLVANIA LIMITED LIABILITY PARTNERSHIP
JOHN J. LEVY, NEW JERSEY RESPONSIBLE PARTNER

Montgomery McCracken Walker & Rhoads LLP

September 30, 2024

Page 2

We thank Your Honor in advance for your continued consideration and understanding. If there are any questions or concerns, please do not hesitate to contact the undersigned.

Respectfully submitted,

**MONTGOMERY MCCRACKEN
WALKER & RHOADS, LLP**

Attorneys for Defendant Maersk A/S

/s/ Timothy Semenoro

Timothy Semenoro

Robert E. O'Connor

CC by ECF to all counsel of record